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 7 fka Green Tree Servicing, LLC a
 Delaware limited liability company
 8

9 **IN THE UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 YUICHI MIYAYAMA, an individual,

12 Plaintiff,

13 vs.

14 QUALITY LOAN SERVICE
 CORPORATION, a California corporation;
 15 DITECH FINANCIAL LLC f/k/a GREEN
 TREE SERVICING LLC, a Delaware
 16 limited liability company; ROES 1-5; and,
 DOES 1-5, inclusive,

17 Defendants.
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Case No. 2:16-CV-00413-JAD-CWH

**EX PARTE MOTION FOR EXTENSION
 OF TIME FOR DITECH FINANCIAL
 LLC TO FILE REPLY IN SUPPORT OF
 ITS MOTION FOR SANCTIONS**

(FIRST REQUEST)

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 20 Defendant Ditech Financial LLC, fka Green Tree Servicing, LLC, a Delaware limited
 21 liability company (“Ditech” or “Defendant”) hereby submits this *Ex Parte* Motion for Extension
 22 of Time for Ditech Financial LLC to file Reply in Support of its Motion for Sanctions.

23 On July 27, 2016 Ditech filed its Motion for Sanctions (ECF No. 22). On August 3, 2016
 24 Plaintiff and Ditech entered into a stipulation whereby Plaintiff’s Opposition to the Motion for
 25 Sanctions was continued to August 22, 2016 (ECF No. 24). On Monday, August 22, 2016,
 26 Plaintiff filed its Opposition to the Motion (ECF No. 28). Ditech’s Reply in support of the
 27 Motion is due on September 1, 2016. Ditech respectfully requests a one week extension to file its
 28

1 Reply. This is the first request for an extension.¹ This request is not being made in bad faith, but
 2 due to previously scheduled travel of Ditech's counsel and her workload upon return from that
 3 travel. See Declaration of Blakeley E. Griffith, attached hereto as **Exhibit 1**. Ditech respectfully
 4 requests that the Court grant the Motion and allow Ditech to file its Reply on **September 8, 2016**.

5 Dated: August 30, 2016.

SNELL & WILMER L.L.P.

6
 7 By: Blakeley E. Griffith
 8 Amy F. Sorenson, Esq.
 9 Blakeley E. Griffith, Esq.
 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, Nevada 89169
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 Tree Servicing, LLC a Delaware limited
 liability company

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IT IS SO ORDERED.

DATED: August 31, 2016

C.W. Hoffman, Jr.
 C.W. HOFFMAN, JR.
 UNITED STATES MAGISTRATE JUDGE

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 28 ¹ Prior to filing this Motion, counsel for Ditech requested an extension from opposing counsel which was denied.

ORDER

IT IS SO ORDERED.

DATED this _____ day of August 2016.

UNITED STATES MAGISTRATE JUDGE

SNELL & WILMER L.L.P.

By: Blakeley E. Griffith
Amy F. Sorenson (NV Bar No. 12495)
Blakeley E. Griffith (NV Bar No. 12386)
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Snell & Wilmer

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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2016, I electronically filed the foregoing ***EX PARTE*** **MOTION FOR EXTENSION OF TIME FOR DITECH FINANCIAL LLC TO FILE REPLY IN SUPPORT OF ITS MOTION FOR SANCTIONS** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 30th day of August 2016.


An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer

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3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

EXHIBIT 1

Declaration of Blakeley E. Griffith in
Support of Ex Parte Motion for Extension of
Time for Ditech Financial LLC to File
Reply in Support of its Motion for Sanctions

EXHIBIT 1

Amy F. Sorenson, Esq.
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Attorneys for Ditech Financial LLC
fka Green Tree Servicing, LLC a
Delaware limited liability company

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

YUICHI MIYAYAMA, an individual,

 Plaintiff,

vs.

QUALITY LOAN SERVICE
 CORPORATION, a California corporation;
 DITECH FINANCIAL LLC f/k/a GREEN
 TREE SERVICING LLC, a Delaware
 limited liability company; ROES 1-5; and,
 DOES 1-5, inclusive,

Defendants.

Case No. 2:16-CV-00413-JAD-CWH

DECLARATION OF BLAKELEY E.
GRIFFITH IN SUPPORT OF *EX PARTE*
MOTION FOR EXTENSION OF TIME
FOR DITECH FINANCIAL LLC TO
FILE REPLY IN SUPPORT OF ITS
MOTION FOR SANCTIONS

I, Blakeley Griffith, declare as follows:

1. I have personal knowledge of all matters set forth herein, except for those matters stated to be based upon information and belief. If called to do so, I would competently and truthfully testify to all matters set forth herein, except for those matters stated to be based upon information and belief.

2. I make this Declaration in support of Ditech Financial LLC's *Ex Parte* Motion for Extension of Time for Ditech Financial LLC to file Reply in Support of its Motion for Sanctions (the "Motion").

3. I am an attorney licensed to practice law in the State of Nevada with the law firm of Snell & Wilmer L.L.P., counsel for Ditech Financial LLC in the above-entitled matter.

1 4. The request for an extension of time is made in good faith and not for the purposes
2 of delay.

3 5. The Motion for Sanctions was filed on July 27, 2016. (ECF No. 22).

4 6. The Opposition to the Motion for Sanctions was filed on August 22, 2016.¹ (ECF
5 No. 28).

6 7. The Reply in support of the Motion for Sanctions is due on September 1, 2016,
7 which is ten days after the Opposition was filed.

8 8. Good cause exists for the extension of time as I had a previously scheduled trip the
9 weekend of August 26, 2016, which could not be moved. I did not return to the office until
10 August 30, 2016. Due to my workload the week of August 22, 2016, I was unable to complete
11 the Reply in support of the Motion for Sanctions prior to this travel.

12 9. As the deadline for the Motion for Sanctions is quickly approaching, I am
13 requesting a short extension of time (one week) to submit the Reply for the Court's consideration.

14 Dated this 30th day of August 2016.

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16 Blakeley E. Griffith
17 BLAKELEY E. GRIFFITH

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28 ¹ Counsel for Ditech had previously agreed to an extension for Plaintiff's Opposition to the
Motion for Sanctions. See ECF No. 24.